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February 9, 2023

VIA ECF

The Honorable Cathy L. Waldor Martin Luther King Jr. Courthouse 50 Walnut Street, Room 4040, Courtroom 4C Newark, NJ 07101

RE: Sun Chemical Corporation v. American International Group, Inc., et al.

Docket No.: 2:20-cv-6252-SRC-CLW

MDMC File No.: A0014-1743

Dear Judge Waldor:

This firm represents Defendants American Home Assurance Company and National Union Fire Insurance Company of Pittsburgh, PA, in its own right and as successor-in-interest to Landmark Insurance Company, ("Defendants"), in the above-captioned matter filed by Sun Chemical Corporation ("Plaintiff").

Pursuant to the case management conference before the Court on October, 26, 2022, Defendants and Plaintiff jointly submit the enclosed proposed Fifth Amended Pretrial Scheduling Order.

Thank you.

Very truly yours,

McElroy, Deutsch, Mulvaney & Carpenter, LLP

/s/ Laurence McHeffey
Laurence McHeffey, Esq.
Lydia K. Deutsch, Esq.

cc: All Counsel of Record (via ECF Notification)